

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

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**LATOYA RANSON et al.**

**PLAINTIFFS**

**VS.**

**CAUSE NO.: 4:20cv165-MPM-DAS  
Jury Trial Demanded**

**CITY OF CLARKSDALE et al.**

**DEFENDANTS.**

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**MOTION TO REOPEN**

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NOW INTO COURT, through undersigned counsel, comes Plaintiff Latoya Ranson et al., by and through their attorney of record, Juan T. Williams, who respectfully moves under Federal Rule of Civil Procedure 60(b)(6) that the Court issue an Order reopening this matter and would show the following:

1. Plaintiffs, Latoya Ranson, Treevious Hayes, and Arniqua Ranson (“Plaintiffs”) filed this action on September 17, 2020 [**Doc. No. 1.**]
2. Mr. Hayes was initially held on an \$800,000.00 bond for his four separate counts of aggravated assault on an officer. *See Ex. A, Justice Court File.*
3. On July 10, 2023, the Court administratively closed this matter pending the outcome of the criminal matter. [**Doc. 96.**]
4. On September 13, 2024, the Circuit Court of Coahoma County Mississippi issued an Order granting an amended petition to expunge Trekevious Hayes of one count of possession of a controlled substance and three counts of aggravated assault. *See Ex. B, Order Granting Amended Petition to Expunge.*

5. The Order stated Mr. Hayes was charged but never indicted. *Id.*

WHEREFORE, the Plaintiffs pray that this Court grant this motion to reopen this matter.

**Respectfully submitted**, this the 16<sup>th</sup> day of September, 2024.

**PERRY GRIFFIN, PC**

By: //s// Juan T. Williams

Juan T. Williams, MSB# 102869

Attorney for Plaintiffs

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**CERTIFICATE OF SERVICE**

I, Juan T. Williams, do hereby certify that a copy of the foregoing document has been forwarded to all counsel of records via the Court's ECF electronic filing data base, on this the 16<sup>th</sup> day of September, 2024.

//s// Juan T. Williams

Juan T. Williams